

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

vs.

*

Case No. MJM-24-0039

AMBER NAYLOR

*

REQUEST FOR A DETENTION HEARING

Defendant, Amber Naylor, by and through undersigned counsel, seeks review of her detention in the above captioned case and in support, states:

1. Defendant was charged via criminal complaint filed on January 23, 2024 with Conspiracy to Distribute and Possess with Intent to Distribute Controlled Dangerous Substances. The Defendant was subsequently indicted on those charges on February 7, 2024.

2. Defendant was arrested and brought before the Court for an Initial Appearance on January 25, 2024. A detention hearing was scheduled for the following day.

3. No suitable residence or third party custodian could be identified and the Defendant consented to detention rather than proceed with the hearing. The Defendant has been detained since that date at the Maryland Correctional Institute for Maryland.

4. Pretrial Services has now screened and approved a residence and third party custodian and it is believed that they will recommend release of Ms. Naylor on electronic home monitoring among other conditions.

WHEREFORE, Ms. Naylor requests a detention hearing be scheduled in this matter.

Respectfully submitted,

/S/ _____
Michael D. DeMartin
Law Office of Michael D. DeMartin, LLC
606 Baltimore Avenue, Suite 301
Towson, Maryland 21204
410-828-9000
Fed Bar ID# 22791

CERTIFICATE OF SERVICE

I certify that on February 29, 2024, this Motion was electronically filed with the Clerk of the United States District Court using CM/ECF, with notice of said filing to Assistant United States Attorney, LaRai Everett, counsel for the Government.

/S/ _____
Michael D. DeMartin